



ENVIRONMENTAL SERVICES DEPARTMENT

AIR QUALITY DIVISION

1001 N. Central Avenue
Phoenix, Arizona 85004

Technical Guidance # 97-004

December 17, 1997

Rule: Rule 337, Section 303.

Issues:

What is meant by "VOC vapor pressure", and how is compliance with Section 303's vapor pressure limits demonstrated?

Discussion:

The differences, if any, between the terms "vapor pressure", "VOC-Vapor-Pressure", and "total partial vapor pressure of all VOC in a cleaning solution" are not provided in the Rule. A practical means of determining vapor pressure is also not provided in the Rule.

Conclusions:

The term "vapor pressure" in Sections 303 and 504.4, and the term, "VOC-vapor-pressure", in Sections 222, 303, and 503.1 all have the same meaning. Therefore:

- If the vapor pressure of a cleaning solution is less than or equal to the applicable vapor pressure limit in Table 2 of Rule 337, the cleaning solution complies with the Rule;
- If a cleaning solution, *as used*, is composed only of VOC(s) and the cleaning solution's vapor pressure exceeds the limit in the Rule, then the cleaning solution is out of compliance with the Rule.
- The third possibility is that cleaning solution contains VOCs as well as other materials such as water or nonprecursors, and the MSDS sheet shows that the vapor pressure of the solution is above the Rule's limit. In this case the partial pressure of the VOCs in the solution must be determined using a method described in Section 504.4.